

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Tonawanda Coke Corporation - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region II

Subject: POLREP #3
RV1
Tonawanda Coke Corporation
0201601
Tonawanda, NY

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From: Thomas Budroe, OSC

Date: 10/20/2018

Reporting Period: 10/20/18

1. Introduction

1.1 Background

| | | | |
|----------------------------|--------------|--------------------------------|--------------------|
| Site Number: | A28U | Contract Number: | |
| D.O. Number: | | Action Memo Date: | |
| Response Authority: | CERCLA | Response Type: | Emergency |
| Response Lead: | STATE | Incident Category: | Removal Assessment |
| NPL Status: | Non NPL | Operable Unit: | |
| Mobilization Date: | 10/13/2018 | Start Date: | 10/13/2018 |
| Demob Date: | | Completion Date: | |
| CERCLIS ID: | NYD088413877 | RCRIS ID: | |
| ERNS No.: | | State Notification: | Yes |
| FPN#: | | Reimbursable Account #: | |

1 Incident Category

Abandoned coke manufacturing plant releasing hazardous substances to the environment.

1.1.2 Site Description

Tonawanda Coke Corporation is a coke manufacturing plant; approximately 160 acres in an industrial area. The facility has been in operation for approximately 100 years. The 30 currently operating coke ovens have been in use since early 1960.

1.1.2.1 Location

The facility is located at 3875 River Rd, Tonawanda, Erie County, New York. The area is an industrial area adjacent to the Niagara River. The nearest residence is located approximately 0.25 miles away.

1.1.2.2 Description of Threat

Flammable liquids contained in bulk storage tanks pose a threat of fire and explosion should they encounter an ignition source. Sodium hydroxide, a corrosive material, has been discharged onto the ground and poses a health threat to anyone who may come in contact with this material. One scrubber tower contains a pyrophoric material which may spontaneously combust if the nitrogen blanket inside the vessel is not maintained. A full removal site evaluation will be conducted and addressed following facility shutdown. Flammable liquids contained in bulk storage tanks pose a threat of fire and explosion should they encounter

an ignition source. Sodium hydroxide, a corrosive material, has been discharged onto the ground and poses a health threat to anyone who may come in contact with this material. One scrubber tower contains a pyrophoric material which may spontaneously combust if the nitrogen blanket inside the vessel is not maintained. A full removal site evaluation will be conducted and addressed following facility shutdown. Flammable liquids contained in bulk storage tanks pose a threat of fire and explosion should they encounter an ignition source. Sodium hydroxide, a corrosive material, has been discharged onto the ground and poses a health threat to anyone who may come in contact with this material. One scrubber tower contains a pyrophoric material which may spontaneously combust if the nitrogen blanket inside the vessel is not maintained. A full removal site evaluation will be conducted and addressed following facility shutdown.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

EPA is inspecting the Site, with limited assistance from TCC, to identify all areas of concern and determine which facility operations will require EPA's immediate attention to circumvent a release of hazardous substances to the environment.

2. Current Activities

2.1 Operations Section

2.1.2 Response Actions to Date

The OSC continues to inspect and evaluate all vessels, systems and releases on the plant. TCC's reluctance to allow EPA to contact key TCC personnel seems to have changed. A key employee has provided valuable information regarding the plant operations and systems. The OSC met with the plant manager to generate a list of personnel essential to the continued safe operation of the plant. The list will be provided to TCC in anticipation that they will keep them on their payroll.

The flaring of the gas sphere has been completed. This was confirmed by NYSDEC this morning. NYSDEC will no longer be on site but will be available for consultation should any of their staff have an expertise in EPA site operations.

A conference call was held between the Removal Program, ORC and DOJ to express concerns over TCC's proposed shutdown of the boilers, the need to evacuate process lines (byproduct area), the continued operation of the storm surface water and process water treatment systems and decommissioning of the scrubber containing pyrophoric material. The scrubber presently requires maintenance of a nitrogen blanket to prevent this from happening. Also discussed was the concern about access to the site by TCC contractors and those purchasing remaining assets of the company. Unless these activities are closely coordinated with EPA, operations could be disrupted, H&S issues could arise, spills could occur, needed equipment could be removed and the cost of the cleanup could be increased.

EPA's ERRS contractor has been in communication with gas and electric utility companies and has started the process of taking them over. EPA's ERRS contractor has also reached agreement on conditions necessary to hire former TCC employees. The hiring of TCC employees could take place by the end of next week.

Three bobtail tractor trucks entered the site and removed material in dump trailers. Although it could not be determined what was being removed, it was suspected that it may have been scrap metal. Photographs were taken of the vehicles as they tarped the trailers before departing the site.

EPA was just advised that last night, an in plant short resulted in a power outage that caused the shutdown of the boiler. The boiler has been restarted and continues coming up to speed. Plant management indicated that the expertise of a consultant was required due to the age of the equipment and that two boiler operators were also needed due to the condition of the boiler.

2.1.3 2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

TCC filed for bankruptcy on October 16, 2018. ORC continues to represent EPA's interest with TCC attorneys.

2.1.4 Progress Metrics

| <i>Waste Stream</i> | <i>Medium</i> | <i>Quantity</i> | <i>Manifest #</i> | <i>Treatment</i> | <i>Disposal</i> |
|---------------------|---------------|-----------------|-------------------|------------------|-----------------|
| | | | | | |
| | | | | | |
| | | | | | |

2.2 Planning Section

2.2.1 Anticipated Activities

EPA is preparing to assume responsibility for securing the Site. The facility is still undergoing the shutdown process following the announcement of bankruptcy. Upon being notified that TCC is no longer maintaining the treatment of storm water and process water discharges, EPA reached out internally to obtain information regarding the two treatment system design and operation. EPA is considering operating these systems with input of experts from EPA's Division of Enforcement and Compliance Assistance (DECA). In order to evaluate the current effectiveness of these systems, EPA will be sampling the discharge from both during the week of October 22, 2018. DESA will conduct sample collection and samples will be analyzed by the EPA Region 2 lab. There has been conflicting information from TCC regarding the layoff of plant personnel responsible for the operation of the boiler which is necessary to maintain steam lines which will provide for additional purging of the system and operation of the byproduct treatment system. It is however EPA's understanding that TCC will continue to operate the boiler in the near term. EPA will continue efforts to assume responsibility for all utilities in order to maintain power to the facility. EPA will also continue to work with the TCC Environmental Manager to gain information regarding plant operations and potential/actual releases of hazardous substances.

2.2.1.2 Next Steps

EPA will continue to assess the potential public and environmental threats posed by the Site.

2.2.2 Issues

TCC will not inform EPA how long they will remain on site to assist with transition.

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

Estimated Costs *

| | Budgeted | Total To Date | Remaining | % Remaining |
|---------------------------|--------------|------------------|--------------|----------------|
| Extramural Costs | | | | |
| ERRS - Cleanup Contractor | \$150,000.00 | \$0.00 | \$150,000.00 | 100.00% |
| Intramural Costs | | | | |
| | | | | |
| Total Site Costs | \$150,000.00 | \$0.00 | \$150,000.00 | 100.00% |

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Other Command Staff

No information available at this time.

3. Participating Entities

3.2 Cooperating Agencies

EPA is coordinating with NYSDEC and the Town of Tonawanda Water Resources Department.

4. Personnel On Site

One OSC and 1 ERRS member are on site.

5. Definition of Terms

No information available at this time.

6. Additional sources of information

7. Situational Reference Materials

No information available at this time.